

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X-----X

RIZWAN RAJA,

Plaintiff,

19-cv-__ (___)

-Against-

JOHN W. BURNS and THE CITY OF NEW YORK,

Defendants.

X-----X

DECLARATION OF BHAIRAVI DESAI

BHAIRAVI DESAI declares pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct:

1. I am the co-founder and executive director of the New York Taxi Workers Alliance (NYTWA), an advocacy group of NYC yellow cab, green car, black car, livery and app-dispatched drivers. Our mission is to fight for justice, rights, respect and dignity for the over 180,000 licensed men and women who labor for long hours with little pay and little protection in the city's taxi and for-hire vehicle industry. I submit this declaration in support of Mr. Raja's motion for a temporary restraining order and a preliminary injunction.

2. I have known Mr. Raja for roughly 20 years since he joined our organizing committee, where he has provided valuable counsel ever since.

3. In approximately 2005, Mr. Raja became a registered representative at the TLC Tribunal, the predecessor to what is now known as the TLC-OATH Tribunal.

4. Many of our members are issued summonses and must appear before the tribunal. Those summonses can result in substantial fines (especially compared to a taxi driver's pay), or even suspension or revocation of their license.

5. It is crucial to our mission that our members (and indeed all TLC-licensed drivers) be able to receive quality and affordable representation in the tribunal. While a driver may represent himself, many or most are unfamiliar with legal processes and terminology. Also, for most of our members English is not their first language. Many TLC rules are difficult to understand for drivers who are not construing them and their nuanced meanings on a regular basis. Mr. Raja also speaks several South Asian languages so he is able to communicate with many of our members and other drivers in their native tongues.

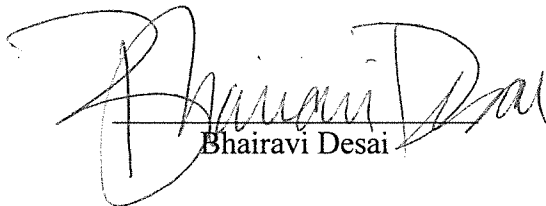
6. For those reasons, NYTWA has arranged for Mr. Raja to represent our members for a discounted fee. While our members can choose any counsel they prefer, our practice is to refer them to Mr. Raja.

7. Our members are extremely appreciative of Mr. Raja's services. I have heard many praise him.

8. While there are others who serve as representatives in the TLC-OATH Tribunal, I believe that few, if any, have the experience and knowledge to match Mr. Raja's.

9. If Mr. Raja's license to practice is suspended, it will, of course, be harmful to him and his family. But it will also harm the interests of our members and the interests of other drivers who rely on his services.

Dated: Queens, NY
March 6, 2018



Bhairavi Desai